

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN**

In Re:

WILLIAM W. MORRIS and
JACQUELINE L. MORRIS,

Debtors.

Case No. 11-07682-swd
Chapter 7; Filed 07/19/2011

HONORABLE SCOTT W. DALES
Bankruptcy Judge

MOTION FOR 2004 EXAMINATION

NOW COMES, Kellogg Community Federal Credit Union (“Credit Union”), through its attorneys, Mika Meyers Beckett & Jones PLC, and pursuant to BR 2004 and L.BR 2004, moves as follows:

1. The Debtors filed their voluntary Chapter 7 Petition on July 19, 2011.
2. Based on proofs of claim filed as of this date, the Credit Union’s unsecured claim constitutes approximately 98% of all unsecured claims filed.
3. The Chapter 7 Trustee is attempting to market and possibly sell the bankruptcy estate’s interest in a September 24, 2007 Land Contract between Hots, Inc., the Land Contract seller, and HOA Enterprises, Inc., the Land Contract buyer, together with the bankruptcy estate’s interest in a Stock Purchase Agreement of the same date.
4. It is the Credit Union’s belief that the Chapter 7 Trustee has not received all of the documentation relating to these transactions. The Credit Union desires to exam the files of Donald H. Dickerson, one of the attorneys representing the parties to the agreements.
5. Pursuant to L.BR 2004(a), the undersigned contacted Attorney Dickerson and arranged a mutually convenient date, time and place for the 2004 examination of Attorney

Dickerson, being Thursday, August 23, 2012, at 3:00 p.m., at Attorney Dickerson's offices located at 230 Helmer Road North, Suite 1, Battle Creek, Michigan 49037.

WHEREFORE, the Credit Union requests that it be permitted to take a Rule 2004 Examination of Attorney Dickerson, directing him to produce and permit inspection and copying of his files relating to the above-referenced transactions, at the time and place specified herein, or at such other time deemed appropriate.

Respectfully submitted,

MIKA MEYERS BECKETT & JONES, PLC
Attorneys for Kellogg Community Federal
Credit Union

Dated: August 13, 2012

By: /s/ Daniel R. Kubiak
Daniel R. Kubiak (P31954)
900 Monroe Avenue NW
Grand Rapids, MI 49503
(616) 632-8000
DKubiak@mmbjlaw.com